

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MEDITERRANEAN SHIPPING COMPANY S.A.,

Plaintiff,

-against-

WORLDWIDE PAPER CO., d/b/a SINGAPORE  
RECYCLE CENTRE PTE LTD., d/b/a XINTAR  
INTERNATIONAL TRADING AND TECHNOLOGIES,  
INC., d/b/a SCT CO., LTD., d/b/a PENINPLASTIC S.L.  
d/b/a OSK PAPER INTERNATIONAL INC.,

Defendants.

1:07-cv-7438 (Hellerstein)

DECLARATION IN  
SUPPORT OF PLAINTIFF'S  
NUNC PRO TUNC EX  
PARTE MOTION TO  
EXTEND TIME TO SERVE  
PROCESS

I, Edward A. Keane, an attorney duly admitted to practice before this Court,  
hereby declare as follows:

1. I am a partner in the law firm of MAHONEY & KEANE, LLP, counsel of record to  
Plaintiff, MEDITERRANEAN SHIPPING COMPANY, S.A. ("MSC"). As such, I am  
familiar, based upon my review of the file maintained by my office, with the pleadings and  
proceedings heretofore had herein.

2. Herewith attached are true copies of the following:

Exhibit # 1: Summons and Complaint;

Exhibit # 2: Affidavit in Support of Plaintiff's Prayer for Attachment and  
Garnishment;

Exhibit # 3: Ex Parte Order of Attachment and Garnishment and Writ of  
Attachment;

3. Plaintiff is seeking to recover from defendants \$1,244,182.87 in ocean freight and other charges relating to a shipment of paper goods from the United States to various points in Asia. (Ex. 1).

4. On or about August 22, 2007, Plaintiff commenced an action in the Southern District of New York against the referenced Defendants. (Id.). And, as none of the defendants are found within the district, an Ex Parte Order of Attachment was the issued by the Court. (Ex. 3).

5. Plaintiff has since made daily service of the Ex Parte Order on several garnishee banks in the Southern District.

6. To date \$25,000.00 has been restrained from defendant SINGAPORE. Counsel has appeared on behalf of the res restrained from defendant.

7. Upon information and belief, however, defendants are still doing business involving United States currency transactions plaintiff expects further electronic funds transfers belonging to defendants and subject to attachment to pass through New York banks.


Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, NY

January 15, 2008

Respectfully submitted,  
MAHONEY & KEANE, LLP.  
Attorneys for Plaintiff  
MEDITERRANEAN SHIPPING COMPANY  
S.A.

By:

  
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